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14 EDWARD GOLDMAN and ANITA WILBUR

15 **UNITED STATES DISTRICT COURT**  
16 **DISTRICT OF NEVADA**

18 ELENA RODRIGUEZ-MALFAVON,  
19 Plaintiff,

20 vs.

21 CLARK COUNTY SCHOOL DISTRICT,  
22 EDWARD GOLDMAN and ANITA  
WILBUR,

23 Defendant.  
24

CASE NO. 2:12-CV-01673-APG-PAL

**STIPULATION AND ORDER TO EXTEND  
TIME FOR PLAINTIFF TO FILE AN  
OPPOSITION TO DEFENDANTS'  
MOTION FOR SUMMARY JUDGMENT**

**[SECOND REQUEST]**

25 In compliance with Local Rules 6-1 and 26-4, Defendants CLARK COUNTY SCHOOL  
26 DISTRICT, EDWARD GOLDMAN and ANITA WILBUR (collectively referred to as  
27 "Defendants") and Plaintiff ELENA RODRIGUEZ-MALFAVON ("Plaintiff"), by and through  
28 their respective counsel of record, hereby stipulate and agree to extend the time for Plaintiff to file

1 an opposition to Defendants' Motion for Summary Judgment (Doc #39) filed January 7, 2015 by  
 2 120-days. The initial deadline for filing the opposition was February 2, 2015. Pursuant to the  
 3 parties' first stipulation to extend the deadline for Plaintiff to file an opposition to Defendants'  
 4 Motion for Summary Judgment, the deadline was extended to March 4, 2015. The new deadline  
 5 for Plaintiff's opposition will be, up to and including, **July 1, 2015**.

6 This stipulation is submitted as an extension is necessary because Plaintiff's counsel is  
 7 continuing to assist with a family member's medical condition which requires regular treatment at  
 8 the Mayo Clinic in Phoenix, Arizona. Additionally, from now until June 1, 2015, Plaintiff's  
 9 counsel will be spending his weekdays and some weekends serving as a State Senator in the  
 10 Nevada legislature in Carson City, Nevada. To that end, NRS 1.310(2) and (3) provide that:

11 2. If an attorney for a party to any action or proceeding in any  
 12 court or before any administrative body, who was actually employed  
 13 before the commencement of any legislative session, is a member of  
 14 the Legislature of the State of Nevada, or is President of the Senate,  
 15 that fact is sufficient cause for the adjournment or continuance of the  
 action or proceeding, including, without limitation, any discovery or  
 for the duration of any legislative session.

16 3. The adjournment or continuance provided for in subsections 1  
 17 and 2 must be granted without the imposition of terms.

18 Although this Court is obviously not bound by Nevada law, it can certainly look to guidance set  
 19 forth in Nevada law if it is relevant.

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1 The parties agree and represent to the Court that this request is made in good faith and not for  
2 the purposes of delay. They also agree that given the length of this proposed continuance no further  
3 extensions will be granted to the Plaintiff and/or her attorney.  
4

5 Dated: March 3, 2015

Dated: March 3, 2015

6 Respectfully submitted,

Respectfully submitted,

8 /s/ Richard Segerblom

/s/ Ethan D. Thomas

9 RICHARD SEGERBLOM, ESQ.

PATRICK H. HICKS, ESQ.

JAMIE CHU, ESQ.

10 Attorney for Plaintiff

ETHAN D. THOMAS, ESQ.

ELENA RODRIGUEZ-MALFAVON

LITTLER MENDELSON, P.C.

Attorneys for Defendants

CLARK COUNTY SCHOOL DISTRICT,

EDWARD GOLDMAN and ANITA WILBUR

14 **ORDER**

15 **IT IS SO ORDERED.**

16 Dated: March 3, 2015.

18 

19 UNITED STATES DISTRICT COURT JUDGE

21 Firmwide:132016249.1 026133.1015